

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

ADWOWA JACOBS,

Plaintiff,

v.

ELECTRONIC DATA SYSTEMS
CORPORATION AND JEFF
WILLIAMS,

Defendants.

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CIVIL ACTION NO.

2:05-CV-925-MHT-SRW

DECLARATION OF TARA RELF

1. My name is Tara Relf. I am currently over twenty-one (21) years of age and I have never been convicted of a felony or crime of moral turpitude. I have been employed by Electronic Data Systems Corporation ("EDS") since November 1, 1995 at EDS' facility in Montgomery, Alabama. From May 2001 to February 2002, I held the position of Service Relations Supervisor of the Correspondence/Research team. In or about February 2002, my job title changed to Business Services Analyst Team Leader. In my role as Team Lead, I am responsible for leading the day to day operations of the Correspondence/Research team. As such, I have personal knowledge of the facts stated herein and they are true and correct.

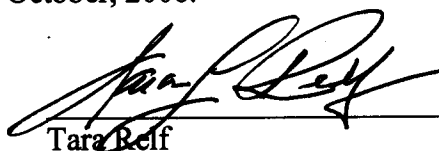
2. I have been Adwowa Jacobs' immediate supervisor and/or team lead since approximately May 2001. On February 10, 2005, Ms. Jacobs approached me and advised me that a coworker, Jeff Williams, had hugged her and rubbed against her on the elevator returning from lunch. Although Ms. Jacobs had requested that I simply inform Mr. Williams' supervisor of the alleged incident, I contacted Christine Cornwell in EDS' Human Resources department and forwarded her copies of the e-mails exchanged between Ms. Jacobs and Mr. Williams immediately after the alleged incident.



3. As a follow-up to my report to Ms. Cornwell, Leslie Liebman of EDS' Employee Relations Department asked me to have Ms. Jacobs provide a written statement as to what she claimed to have occurred on the elevator. On February 23, 2005, Ms. Jacobs submitted a typewritten statement detailing her account of what had allegedly occurred on the elevator with Mr. Williams. In this written statement, Ms. Jacobs claimed that Mr. Williams has "brushed" her behind, put his arms around her waist, untucked her shirt and rubbed her bare stomach, laid his head on her shoulder, and said, "you feel so good." Neither in her original report of the incident to me, or in her written statement, did Ms. Jacobs indicate that Mr. Williams had rubbed her breasts or put his hand down her pants.

I declare under the penalty of perjury of the laws of the United States of America (28 U.S.C. § 1746) that the foregoing is true and correct.

EXECUTED this 26 day of October, 2006.



Tara Relf